

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

George J. Gerro, Esq.
530 S. Glenoaks Blvd., Suite 200
Burbank, CA 91502
(818) 840-0000
George@GerroLaw.com

Self-Represented Creditor

In Re:

BLOCKFI INC., *et al.*,¹

Debtors.

U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ

2023 JUL 27 P 12:57

JEANNE A. NAUGHTON

BY:  DEPUTY CLERK

Case No.: 22-19361 (MBK)
(Jointly Administered)

Chapter 11

Hearing: August 17, 2023, 10:00 a.m. E.T.

Judge: The Honorable Michael B. Kaplan

**NOTICE OF MOTION OF CREDITOR GEORGE J. GERRO
FOR AN ORDER TEMPORARILY ALLOWING CLAIM NO. 12386
PURSUANT TO F.R.B.P. RULE 3018(a)
FOR THE SOLE PURPOSE OF VOTING ON A CHAPTER 11 PLAN**

PLEASE TAKE NOTICE that Creditor George J. Gerro (“Gerro”) will move for an order temporarily allowing Claim Number 12386 in an amount of 426 bitcoin (BTC) or equivalent dollar amount, pursuant to Federal Rules of Bankruptcy Procedure rule 3018(a), for the sole purpose of voting on any Chapter 11 Plans filed in the above-entitled case (“Motion”), on August 17, 2023 at 10:00 a.m. (ET), or as soon thereafter as counsel may be heard, before the

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors’ service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge, Courtroom #8, of the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”), 402 East State Street, Trenton, New Jersey 08608, or such other physical or virtual location as may be determined by the Court.

PLEASE TAKE FURTHER NOTICE that Gerro shall rely upon his previously filed *Response Of George J. Gerro To Debtors’ Fourth Omnibus Objection To Certain Claims; And Cross-Motion Of George J. Gerro For An Order Temporarily Allowing Claim No. 12386 Pursuant To F.R.B.P. Rule 3018(A) For The Sole Purpose Of Voting On A Chapter 11 Plan [Docket No. 1192]*, *The Certification Of George J. Gerro In Response To Debtors’ Fourth Omnibus Objection To Certain Claims And In Support Of Cross-motion Of George J. Gerro For An Order Temporarily Allowing Claim No. 12386 Pursuant To F.R.B.P. Rule 3018(A) For The Sole Purpose Of Voting On A Plan [Docket No. 1192-2]*, *Memorandum Of Law In Support Of The Response Of George J. Gerro To Debtors’ Fourth Omnibus Objection To Certain Claims And Cross-Motion Of George J. Gerro For An Order Temporarily Allowing Claim No. 12386 Pursuant To F.R.B.P. Rule 3018(A) For The Sole Purpose Of Voting On A Chapter 11 Plan [Docket No. 1192-4]* (collectively, the “Motion Package”), the *Debtors’ Fourth Omnibus Objection To Certain Claims (duplicates, books and records, debtor not liable) [Docket No. 1069]* (“Objection”), and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion Package.

PLEASE TAKE FURTHER NOTICE that Gerro will appear pursuant to the United States Code, Title 28, § 1654, and Federal Rules of Bankruptcy Procedure, Rule 9010(a).

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be served not later than seven (7) days before the hearing date, and Gerro reserves the right to file a reply thereto not later than two (2) days before the hearing date.

PLEASE TAKE FURTHER NOTICE Written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Clarkson S. Fisher Courthouse, 402 E. State Street, Trenton, New Jersey 08608. A copy thereof must be concurrently and electronically served upon George J. Gerro, 530 S. Glenoaks Blvd., Suite 200, Burbank, California 91502, telephone: (818) 840-0000, email: George@GerroLaw.com

PLEASE TAKE FURTHER NOTICE that this Notice of Motion and the Motion Package will be served on the Master Service List. Gerro respectfully submits that no further notice is required. In the absence of any objections, the relief requested hereunder may be granted without further notice.

PLEASE TAKE FURTHER NOTICE that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

Burbank, California
Dated: July 27, 2023

/s/ George J. Gerro

George J. Gerro, Esq.
530 S. Glenoaks Blvd., Suite 200
Burbank, California 91502
(818) 840-0000
George@GerroLaw.com

Self-Represented Creditor